## **Exhibit KK**

#### In The Matter Of:

ADELPHIA COMMUNICATIONS CORP. v. DELOITTE & TOUCHE, LLP

JOSEPH MICHAEL BRADY March 10, 2005

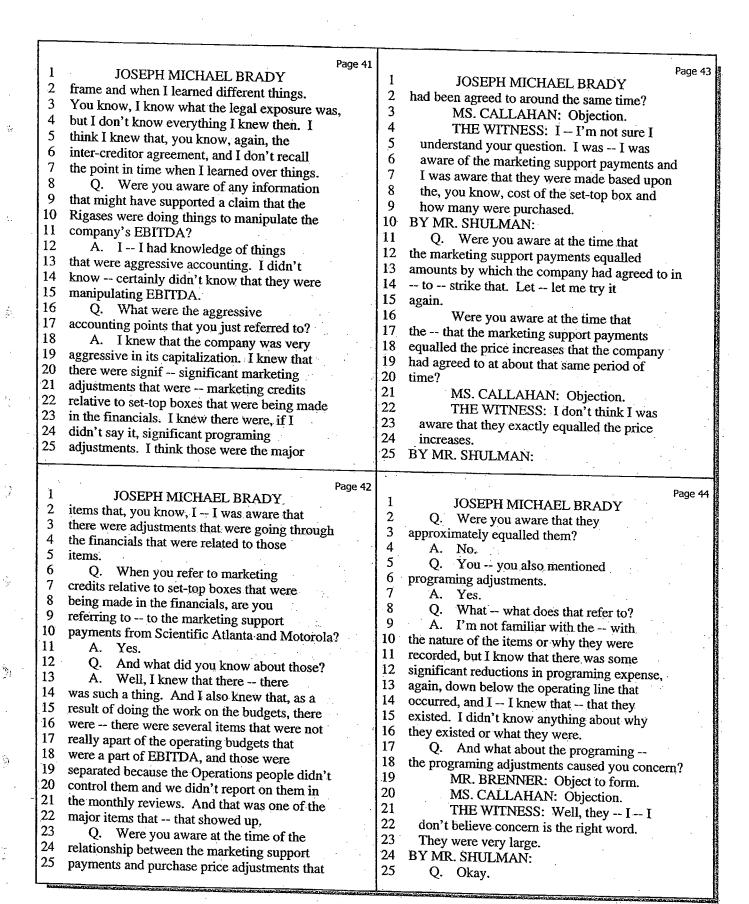
### LEGALINK MANHATTAN

420 Lexington Avenue - Suite 2108

New York, NY 10170

PH: 212-557-7400 / FAX: 212-692-9171

BRADY, JOSEPH MICHAEL



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1 JOSEPH MICHAEL BRADY	1 JOSEPH MICHAEL BRADY
<ol> <li>Q. And did you raise that issue with</li> </ol>	
3 anybody at the company?	3 A. Okay.
4 A. No, other than I believe the same	e 4 Q. So I think you got to define
5 conversation I'll correct that. No, I	5 what what what that means.
6 think in the same conversation with Tim	Werth 6 A. All right. Let me try it this
7 we were just having a general conversati	
8 regarding those below the line items, and	
9 I believe I would have asked him about t	
10 as well in terms of what would be booke	1 " " " " " " " " " " " " " " " " " " "
11 forward.	11 responsible for. That would not include, for
12 Q. And what did he say?	12 instance, the programing credit. So when I
13 A. I – I don't recall his answer	13 say below the line, the line stopped at at
14 other than, again, I was satisfied with his	
answer. His answer was something like	
aggressive accounting, Deloitte knows a	bout 16 the line, it would be all of the accounting,
the accounting, and that was pretty much	
18 Q. Did you ever ask anybody at	18 have direct responsibility for.
19 Deloitte whether what their awareness	
20 of the accounting?	20 EBITDA line or does it mean below some other
21 A. No.	20 EBITDA line of does it mean below some other 21 line?
Q. Did you ever raise any issue or	
23 any aspect of the marketing support pays	
24 with anybody from Deloitte?	1
25 A. No.	24 Q. Okay. 25 A for operational analysis
	25 A for operational analysis
	Page 50 Page
1 JOSEPH MICHAEL BRADY	1 JOSEPH MICHAEL BRADY
2 Q. Was it your understanding that	2 purposes.
3 that the way the marketing support was	Q. You said that you had lots of con
4 accounted for actually, strike that.	4 at that when you started doing budgeting
When you used the phrase "below	you had lots of confusion about accounting
6 the line items" in one of your prior answ	J. T.
7 tell me what you mean by that.	ers, 6 adjustments affecting numbers that the
<ul><li>7 tell me what you mean by that.</li><li>8 A. What I mean is that when I</li></ul>	ers,  6 adjustments affecting numbers that the 7 Operations people had no responsibility for. 8 Explain what you mean by that.
<ul> <li>7 tell me what you mean by that.</li> <li>8 A. What I mean is that when I</li> <li>9 initially started doing the budgeting reviews</li> </ul>	ers,  6 adjustments affecting numbers that the 7 Operations people had no responsibility for. 8 Explain what you mean by that. ews  A. Well, two good examples would be
<ul> <li>tell me what you mean by that.</li> <li>A. What I mean is that when I</li> <li>initially started doing the budgeting review</li> <li>which would be conducted with all of the</li> </ul>	ers,  6 adjustments affecting numbers that the 7 Operations people had no responsibility for. 8 Explain what you mean by that. ews 9 A. Well, two good examples would be 10 the ones that we've talked about, the
<ul> <li>tell me what you mean by that.</li> <li>A. What I mean is that when I</li> <li>initially started doing the budgeting reviewhich would be conducted with all of th</li> <li>Regional Vice-Presidents, we had a lot of</li> </ul>	ers,  6 adjustments affecting numbers that the 7 Operations people had no responsibility for. 8 Explain what you mean by that. ews 9 A. Well, two good examples would be 10 the ones that we've talked about, the
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2 continue to have confusion in these meetings   2 people control	
over items that they don't have responsibility 3 O Did you did you reise	the issue
4 with the Rigages in the context of	of these
5 Items that they understand and control and   5 adjustments are being made and	they're
o confine our discussion to those, and show the	are having a
/ Significant positive impact on El	RITDA?
1 o to focus on those the those Operational 18 MS CALLAHAN. Objection	ection Do you
want to be more specific with	respect to
10 Q. And what what did they say? 10 the Rigases?	
A. They they agreed. I don't know 11 MR SHITI MAN. Appl	of the Rigases
1 12 Whether they initially agreed, but they It 12 And then if he did we'll get to	them. to
wash t very long perore that's what we did. 13 which one	
14 Q. Okay. Was it your understanding 14 THE WITNESS: I don't	believe I
15 unat the marketing support 15 addressed them in the context	that thev
17 adjustifients, it i can use that term, had the	on EBITDA. I
addressed them within the con	text that they
18 were significantly impacting the	ne numbers.
and if we included those numb	ers in the
Operational reviews, people w	ouldn't be
able to to respond to our que	estions.
adjustments were reduce the expense. 22 BY MR. SHULMAN:	
23 Q. Okay. I take it that you	didn't
24 focus on the BBITDA impact, vo	ou focused on
A. Well, I didn't see all of the 25 people not understanding what the	he numbers are?
Page 54	
IOOFDITAGGGGATATI	Page 56
2 different adjustments, but my overall 2 A Right My job was One	
2 different adjustments, but my overall 3 understanding was the ones I was looking at 3 Operational reviews. I didn't for	rations and
2 different adjustments, but my overall 3 understanding was the ones I was looking at 4 that that hit my radar screen were reducing  2 A. Right. My job was Ope 3 Operational reviews. I didn't foo	rations and
2 different adjustments, but my overall 3 understanding was the ones I was looking at 4 that that hit my radar screen were reducing 5 the programing expense.  2 A. Right. My job was Ope 3 Operational reviews. I didn't for 4 accounting aspects of those and 5 were right or wrong. It was that	rations and cus on the whether they
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Page 173 Page 175 JOSEPH MICHAEL BRADY 1 JOSEPH MICHAEL BRADY A. Yes, I did. 2 you had had that conversation with the 3 Q. The memo indicates in the next 3 Rigases? 4 part of it, the top of the next page and down 4 A. Yes. 5 to the heading that there were four contacts Q. Did you have an understanding as 5 6 that you had had with the Rigas and then to how the lawyers learned of that 6 7 it descr -- the Rigases and then it describes 7 conversation with the Rigases? 8 those contacts. 8 A. Yes, because I told -- told Randy 9 Do you see that? 9 Fisher --10 10 A. Yes. Q. Who was the general counsel? 11 Q. Can you take a -- a brief moment 11 A. -- as I was required to do, and 12 or more if you need it to just look at the 12 I'm sure he informed them and then I received 13 four contacts that are described there and 13 a call. tell me whether that is an accurate summary of Q. And Randy Fisher was the general 14 15 the contacts that you had had with the Rigases 15 counsel of Adelphia at the time? 16 up to that point. 16 A. Yes. 17 A. Okay. Well, in the first bullet, 17 Q. Since the time of this interview, 18 I mean, I agree, although, I don't know, some have you had any contacts with any of the 18 of these adjectives I can't imagine that I 19 19 Rigases? said, like shell-shocked, but regardless that 20 20 A. Let me think about that. I have. meeting took place. Let me just try to think of -- yeah, I can 21 21 22 Second one took place. I don't 22 recall two, two, two times. 23 recall the -- the handcuffs. 23 One -- actually, three times. One 24 John Rigas... Yeah, I kind of 24 I was in a local restaurant and they all 25 remember that with Ron, I asked his opinion on 25 walked in and I said hello. That was a Page 174 Page 176 JOSEPH MICHAEL BRADY JOSEPH MICHAEL BRADY 2 that. I don't think I ever talked to John 2 five-minute hello. I don't know the time 3 though in that context on the third bullet. 3 frame of that. 4 Q. Okay. 4 O. Okay. 5 A. I think the last comment, the way 5 A. The other one was -- I do remember 6 they've characterized it, it's probably not 6 the time frame 'cause it was right after I had 7 accurate. Actually, that's why I had the call left my job at Adelphia. And I received a 8 with them --8 call from Mike Rigas, and he asked me to come 9 Q. Okay. 9 out and meet with him, which I did. 10 A. -- is because on November 6th I --10 Meet with him about what? 11 I saw the Rigases having dinner at a place in Well, hadn't seen them in a long 11 12 Coudersport, and I hadn't seen them in a long 12 time, it was a social visit, but also I think, 13 time, and I stopped and I went into their 13 you know, it was a visit to understand why I property and, yeah, we talked a lot about very left Adelphia and what I was going to be 14 15 personal things, just like what I described, 15 doing, you know, and whether I was going to which most people outside of Coudersport can't 16 stay there and keep my kid in school, and that 17 understand. sort of thing. 17 18 And so that's really, you know, my 18 Q. Was there any discussion about 19 view. And earlier why I said I was angry, 19 the -- the criminal proceedings? I -- I was -- I was angry that I would have a 20 20 conversation like that, follow the company 21 Q. Were you ever asked by either the 22 policy, and the next day be talking to four 22 government or any of the Rigases about being a 23 attorneys. 23 witness at the criminal trial? 24 Q. Was -- was it your impression that 24 A. The only thing one of -- I don't the lawyers called you the next day because know -- one -- an attorney did contact me on

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1	JOSEPH MICHAEL BRADY	1	JOSEPH MICHAEL BRADY	
2	two or three occasions to speak with them	2	very abbreviated. I didn't want to talk about	
3	regarding regarding what, I don't know.	3	it. And I just said it really didn't happen	
4	Q. Do you know	4	that way, John, it was really more than	
5	A. And I I refused to do that.	5	anything my decision.	
6	Q. Do you know who that lawyer was or	6	Q. And did he say anything at that	
7	who he represented?	7	point?	
8	A. I'm not sure. It might have been	8	A. No.	
9	Christie, but I I don't know. I know they	9	Q. And did you have any discussion of	
10	represented the Rigases and I know they I	10	substance with Tim Rigas?	
11	called them I returned their call several	11	A. No, we just talked purely about	
12	times.	12	golf and my children.	
13	Q. But never talked to them?	13	Q. During this time at Mike Rigas's	
14	A. No, I told them I wasn't willing	14	house	
15	to talk to them.	15	A. This was actually at their just	
16	Q. How many times how many times	16	to clarify, they have a building that's kind	
17	were you asked to talk to Rigas lawyers with	17	of a business. It's not Mike's house.	
18	regard to the criminal trial?	18	Q. Okay.	
19	A. I think it was three times.	19	A. It's separate from their house,	
		20	that's why	
20	Q. Did any lawyers for Adelphia ever	4		
21	ask you if they could talk to you about any of	21	Q. On their property?	
22	the other proceedings that are going on	22	A. On their property. And that's	
23	regarding Adelphia?	23	where they were.	
24	A. I don't believe so.	24	Q. Was there any discussion of what	
25	Q. Anybody from the Boies Schiller	25	had happened at Adelphia?	
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	JOSEPH MICHAEL BRADY firm ever contact you?  A. No. Q. Anybody from the Dechert firm ever contact you? A. Again, these firms, if if they don't represent the Rigases, they didn't. Q. Okay. A. But I don't know who they are. Q. Okay. A. I mean, I know who they are, but I don't know who they represent. Q. The the the incident the the incident with Michael Rigas and going to his house to talk to him, about how long did you spend? A. Probably spent an hour, and I spoke with Mike, Tim and to a very limited extent John. Q. Do you recall anything of substance that was said? A. The only thing John asked me some	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	JOSEPH MICHAEL BRADY A. I don't I don't think so. It was it was a type of meeting where it was purely personal. And as I said, John interjected a couple things that were getting close to business related, I think Tim and Mike understood that that's not what we wanted to talk about, and we talked about personal matters.  Q. I think you indicated that there was a third time that you had contact with the Rigases.  A. Right. The third time was right after the trial. I was actually lost and I was walking down Colesburg Road and I'd already walked about nine miles and Mike Rigas was getting out of his car, and just by chance, and I walked across the street and said hello to him.  Q. Anything of substance then? A. No. Q. Any mention made of the results of the criminal trial?	180

	Page 225		Page 22
I	JOSEPH MICHAEL BRADY	1	JOSEPH MICHAEL BRADY
2	was with the accounting group. He worked	2	Q. During this same time, did you
3	for me in the budget group after I had	3	ever have a question in your own mind as to
4	hired Jim Devlin, and I have a lot of	4	whether the company was maintaining two sets
5	respect for Luke's ability and his	.5	of books, one for internal purposes and one
6	integrity.	6	for external purposes?
7	BY MR. SHULMAN:	7	A. No, $I - I$ didn't, other than what
8	Q. Did you form any view about the	8	I mentioned earlier, which is the only thing I
9	ability or integrity of Doug Malone?	9	can based on my knowledge is the only thing
10	MS. CALLAHAN: Objection.	10	I can relate to the testimony that was
11	THE WITNESS: I worked with Doug	11	provided on two sets of books was we did have
12	in a limited amount. I I felt I felt	12	two different views of looking at things. One
13	like he was pretty pretty good and I	13	was the operational and one was
14	never had any question about his integrity.	14	Q. During the time that you were
15	BY MR. SHULMAN:	15	
16	Q. During the time that you worked at	16	during the same period of time, okay, did you
17	Adelphia, up to the point where the Rigases	17	ever have a question as to whether the senior
18	disengaged or were terminated, did you ever -	18	financial executives of the company were doing
19	was there ever a question in your mind about	19	things that were that were meant to
20	whether the company was manipulating its	20	overstate or manipulate EBITDA?  A. No.
21	publicly reported financial results?	21	
22	MS. CALLAHAN: Objection.	l	Q. Did you ever have a question in
23	THE WITNESS: I wouldn't state it	22	your mind as to whether the senior financial
24	in those terms. Again, I stated earlier	23	executives were doing things to manipulate
25	that I noticed that there were differences,	24	debt covenant compliance?
	- Thouseof that there were differences,	25	A. No.
٠.	Page 226		Page 2
1	JOSEPH MICHAEL BRADY	.1	Page 2 JOSEPH MICHAEL BRADY
2	but I never thought that it was	2	Q. Did you ever form a view strike
3	manipulation. I wouldn't have the	3	that.
4	information to know that.	4	Did you ever have a question in
5	BY MR. SHULMAN:	5	your own mind as to whether the senior
6	Q. Did when you saw that there	6	executives were or might be doing things to
7	were differences, between the internal numbers	7	inflate the management fees charged to the
8	and the external numbers, did you attempt to	8	Rigas entities that the company managed?
9	talk to more senior executives like Tim Rigas	9	A. No.
10	or Michael Rigas to try to resolve in your own	10	
11	mind the inconsistencies?	11	Q. Did you ever have a question in your mind as to whether the financial
12	A. I think you asked me that before	12	
13	and I had indicated that I did talk to Mike	13	executives of the company might be improperly
14	Rigas at one time and no one else.	14	transferring debt from Adelphia books to Rigas
15	Q. And after that discussion with		entity books?
16	Michael Rigas, did he resolve for you the	15	A. No.
17	inconsistencies?	16	Q. Did you ever have a question in
18	A. No.	17	your mind as to whether senior executives were
19		18	manipulating statistics that were publicly
20	S Journal	19	reported regarding the rebuild efforts of the
21	Adelphia, up again up to the point where	20	company?
	the Rigases were terminated, did you ever have	21	A. No.
22	a question raised in your own mind about	22	Q. In going back to Exhibit 184,
23	whether the company was failing to disclose	23	the email, and I think maybe we've covered
24 25	material information in its public financials?	24	J
43	A. No.	25	second paragraph of the email there's there
		ı	I Sold and a series of the color

13 h

, **\$**)

, (j.)

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# **Exhibit LL**

### In The Matter Of:

# ADELPHIA COMMUNICATIONS CORP. v. DELOITTE & TOUCHE LLP

#### ANN MONTGOMERY May 19, 2005

LEGALINK MANHATTAN
420 Lexington Avenue - Suite 2108
New York, NY 10170
PH: 212-557-7400 / FAX: 212-692-9171

MONTGOMERY, ANN



1 ANN MONTGOMERY 2 Q. And the pie charts were in connection 3 with what? 3 with what? 4 A. Investor presentations. 5 Q. And are they presentations that you made? 7 A. I participated in some of the presentations. Mainly the customer service side. 9 side. 10 Q. Do you happen to know how Adelphia defined when a mile of plant was rebuilt? 11 defined when a mile of plant was rebuilt? 12 A. No, I don't recall that was rebuilt? 13 Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant? 14 A. I don't recall any delays. 15 Q. Do you recall that, no. 16 Q. Do you recall tere being any delays. 17 Q. Do you recall tere was the state of the company regarding numbers. Is that		· · · · · · · · · · · · · · · · · · ·		
1 ANN MONTGOMERY 2 Q. And the pic charts were in connection 3 with what? 4 A. Investor presentations. 5 Q. And are they presentations that you made? 7 A. I participated in some of the presentations. Mainly the customer service side, side, or side, side, side, or side, s		Page 169		
with what?  A. Investor presentations.  A. Investor presentations that you made?  A. I participated in some of the presentations. Mainly the customer service side.  Q. Do you happen to know how Adelphia defined when a mile of plant was rebuilt?  A. No, I don't recall.  Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant?  A. I don't recall any delays.  Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant?  A. I don't recall any delays.  Q. Do you recall there to again memo from Rob McVie that described problems with late reporting of completed miles?  A. I don't recall that, no.  10 Q. Do you be did not. That I recall. I don't recall that.  A. Tim Rigas, no, he did not. That I recall. I don't recall that.  Page 170  A. Chris Thurner. Correct.  There was no discussion thereafter  A. Chris Thurner. Correct.  There was no discussion thereafter  A. No. It's purely friendship. Nothing about the specifics of what they may have denore the things they testified to?  A. No. It's purely friendship. Nothing about the specifics of what they may have denore the mines they may have were paid?  A. I don't recall that.  A. I don't recall there it was \$325,000 a year, I'm not sure. Son on, I don't know what any of the Rigases  Were paid?  A. I don't record the me rease while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year.  Q. Do you know what any of the Rigases  Were paid?  A. Oh, just from their – on the profile on Yahoo, I think it was 209,000 a year, I'm not sure. Son on, I don't know where actual that were paid higher than you?  A. Oh, pust from their – on the profile on Yahoo, I think it was 209,000 a year, I'm not sure. Son on, I don't know where actual the paid the paid to testify about in the criminal trial?  A. Oh, just from their – on the profile on Popole on Popole with whomon you are		ANN MONTGOMERY	1.	ANN MONTGOMERY
4 A. Investor presentations. 5 Q. And are they presentations that you made? 7 A. I participated in some of the presentations. Mainly the customer service side. 9 presentations. Mainly the customer service side. 9 Q. Do you happen to know how Adelphia defined when a mile of plant was rebuilt? 10 Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant? 11 Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant? 12 A. I don't recall any delays. 13 Q. Do you recall receiving a memo from Rob McWe that described problems with late reporting of completed miles? 14 Lord'r tecall that, no. 15 Q. Do jou recall receiving a memo from Rob McWe that described problems with late reporting of completed miles? 16 A. Tim Rigas, no, he did not. That I recall. I don't recall that. 17 C. Jid Tim Rigas ever tell you to change the found in umbers for any presentation because he thought they were too aggressive? 18 A. Tim Rigas, no, he did not. That I recall. I don't recall that. 19 Q. Do you know were at Adelphia. Could you tall me what your salary was when you were at Adelphia. Could you tall me what your salary was when you were at Adelphia. Could you along was when you were at Adelphia. Could you along was when you were at Adelphia. Could you along was were paid? 10 ANN MONTGOMERY 2 Q. I don't think you told us what your salary was when you were at Adelphia. Could you along was when you were at Adelphia personnel that were paid higher than you? 2 Q. Do you know what any of the Rigases were paid? 3 A. I don't know what any of the Rigases were paid? 4 A. Oh, just from their — on the profile on Yahoo, I think it was 209,000 a year, I'm not sure. So no, I don't know their actual compensation. 4 A. You'd have to define "improper 222 canduct." 5 Q. With respect to the issues that have		Q. And the pie charts were in connection	2	
A. And are they presentations that you made?  A. I participated in some of the presentations. Mainly the customer service side.  Q. Do you happen to know how Adelphia defined when a mile of plant was rebuilt?  A. No, I don't recall.  Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant?  A. I don't recall any delays.  Q. Do you recall tree being any difficulties with people in the field delaying and reporting miles rebuilt for the plant?  A. I don't recall any delays.  Q. Do you creal treeiving a memo from the poble of the folder miles?  A. I don't recall that, no.  Q. Did Tim Rigas ever tell you to change the 2002 rebuild numbers for any presentation because he thought they were too aggressive?  A. Tim Rigas, no, he did not. That I recall. I don't recall that.  1 A. When I started there it was \$325,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, I'm not sure. So no, I don't know what anybody else's pay ware, so no, I don't know what anybody else's pay ware. So no, I don't know their actual compensation.  Q. Do you know what anyod you you have reased them what their more and t		with what?		
Q. And are they presentations that you made had a participated in some of the presentations. Mainly the customer service side.  Q. Do you happen to know how Adelphia defined when a mile of plant was rebuilt? A. No, I don't recall. Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant? A. I don't recall any delays. Q. Do you greal receiving a memo from Rob McVie that described problems with late reporting of completed miles? A. I don't recall that, no. Q. Do you recall there being any district that described problems with late reporting of completed miles? A. I don't recall that, no. Q. Do you recall that, no. Q. I don't recall that, no. Q. I don't treall that, no. Q. I don't treall that, no. Q. I don't treall that.  Page 170 A. Tim Rigas, no, he did not. That I recall. I don't recall that.  Page 171 A. ANN MONTGOMERY Q. I don't think you told us what your salary was when you were at Adelphia. Could you tell me what your salary was. A. When I started there it was \$325,000 a year, and I received a merit increase while I was store. When I left my rate was \$340,000 a year.  Q. Do you know of any Adelphia personnel that were paid higher than you? A. I don't know what anybody else's pay ware, no, but the was 209,000 a year, I'm not year.  Q. Do you know what anybody else's pay were paid? A. Oh, just from their — on the profile on Yahoo, I think it was 209,000 a year, I'm not year.  Q. Prior to March 27th, 2002 were you aware of any improper conduct by any of the Rigases that have  The provided marker of the fine pop of the on Yahoo, I think it was 209,000 a year, I'm not year.  Q. With respect to the issues that have		A. Investor presentations.	4	have.
6 made? 7 A. I participated in some of the 8 presentations. Mainly the customer service 9 side. 9 Q. Do you happen to know how Adelphia 11 defined when a mile of plant was rebuilt? 12 A. No, I don't recall. 13 Q. Do you recall there being any 15 and reporting miles rebuilt for the plant? 16 A. I don't recall any delays. 17 Q. Do you recall tree being any 18 reporting of completed miles? 19 A. I don't recall any delays. 20 A. I don't recall that, no. 21 Q. Did Tim Rigas ever tell you to change the 22 the 2002 rebuild numbers for any presentation specials and recall that, no. 22 A. Tim Rigas, no, he did not. That I recall. I don't recall that. 21 A. When I started there it was \$325,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I was there. So no, I don't know what anybody else's pay ware, so no, I don't know what anybody else's pay ware. So no, I don't know their actual compensation.  9 Q. Do you know what anybody else's pay ware. So no, I don't know their actual compensation.  9 Q. Prior to March 27th, 2002 were you aware of any improper conduct by any of the Rigases were paid?  24 A. You'd have to define "improper 222 23 conduct."  25 A. This Part and friendships, who you talked to after the cri	4	<ul> <li>Q. And are they presentations that you</li> </ul>	5	
presentations. Mainly the customer service side.  growth an intervention of the composition of the compositi		made?	6	MR DAVIS: I just have a couple I'm
presentations. Mainly the customer service side.  10 Q. Do you happen to know how Adelphia defined when a mile of plant was rebuilt?  2 A. No, I don't recall.  3 Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant?  4 A. I don't recall any delays.  5 Q. Do you can life rebuilt for the plant?  6 A. I don't recall any delays.  7 Q. Do you can lercedwing a memo from two body for completed miles?  8 A. I don't recall that, no.  9 Q. Do you froughted miles?  10 A. I don't recall that, no.  11 don't recall that, no.  12 depth of the plant of the plant?  13 don't recall that, no.  14 don't recall that, no.  15 don't recall that, no.  16 A. I don't recall that, no.  17 Q. Do you for the plant?  18 admitted that she falsified crain numbers. Did you discuss that with her	1	<ul> <li>A. I participated in some of the</li> </ul>	7	sorry.
9 Q. Do you happen to know how Adelphia defined when a mile of plant was rebuilt? 10 Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant? 10 A. I don't recall any delays. 11 Q. Do you recall receiving a memo from Rob MrKie that described problems with late reporting of completed miles? 12 A. I don't recall that, no. 13 Q. Did Tim Rigas ever tell you to change the 2002 rebuild numbers for any presentation because he thought they were too aggressive? 14 A. Tim Rigas, no, he did not. That I recall. I don't recall that. 15 A. When J istarted there it was \$325,000 a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year, and I received a merit increase while I A. I don't know what anybody else's pay was, no. 19 Q. Do you know what anybody else's pay was, no. 20 Q. Do you know what anybody else's pay was, no. 21 Q. Do you know what anybody else's pay was, no. 22 Q. Do you know what anybody else's pay was, no. 23 Q. Do you know what anybody else's pay was, no. 24 Q. Do you know what anybody else's pay was, no. 25 Q. Do you know what anybody else's pay was, no. 26 Q. Do you know what anybody else's pay was, no. 27 Q. Do you know what anybody else's pay was, no. 28 Q. Do you know what anybody else's pay was, no. 29 Q. Do you know what anybody else's pay was, no. 30 Q. Do you know what anybody else's pay was, no. 31 Q. Do you know what anybody else's pay was, no. 32 Q. Do you know what anybody else's pay was, no. 33 Q. Do you know what anybody else's pay was, no. 34 Q. Do you know what anybody else's pay was, no. 35 Q. Do you know what anybody else's pay was, no. 36 Q. Do you know what anybody else's pay was, no. 37 Q. Do you know their actual compensation. 38 Q. Do you know their actual compensation. 39 Q. Thank you. 30 Q. Do you know their actual compensation. 30 Q. Prior to March 27th, 2002 were you aware of any improper conduct by any of the Rigases? 30 Q. With respect to the issues that have		presentations. Mainly the customer service	8	
defined when a mile of plant was rebuilt?  A. No, I don't recall.  Q. Do you recall there being any difficulties with people in the field delaying and reporting miles rebuilt for the plant?  A. I don't recall any delays.  Q. Do you recall any delays.  O. Do you recall may delays.  O. Do you recall any delays.  O. Do you recall there being any delays.  O. Do you recall that, no.  O. Did Tim Rigas ever tell you to change the 2002 rebuild numbers for any presentation because he thought they were too aggressive?  A. Tim Rigas, no, he did not. That I recall. I don't recall that.  Page 170  A. When I started there it was \$325,000 a year, rand I received a merit increase while I was there. When I left my rate was \$340,000 a year.  A. I don't know what any of the Rigases were paid?  A. I don't know what any of the Rigases were paid?  A. I don't know what any of the Rigases?  A. Oh, just from their — on the profile on Yahoo, I think it was 209,000 a year, I'm not sure. So no, I don't know their actual compensation.  Q. Prior to March 27th, 2002 were you aware of any improper conduct by any of the Rigases?  A. You'd have to define "improper conduct."  Q. With respect to the issues that have		side.	9	O. In answer to Ms. Vendaulos questions
defined when a mile of plant was rebuilt?  2 A. No, I don't recall.  3 Q. Do you recall there being any difficutties with people in the field delaying and peopting miles rebuilt for the plant?  4 A. I don't recall any delays.  5 Q. Do you recall receiving a memo from Rob McVie that described problems with late reporting of completed miles?  6 A. I don't recall that, no.  7 Q. Did Tim Rigas ever tell you to change the 2002 rebuild numbers for any presentation because he thought they were too aggressive?  A. Tim Rigas, no, he did not. That I recall. I don't recall that.  7 Page 170  A. When you say "respecting their testimony regarding numbers," what do you mean?  Q. I deam the fact that during the criminal trial Raren Chrosniak, for example, admitted that Safe falsified certain numbers. Did vou discuss that with her—  A. No. When we talk, we don't talk about the Adelphia case.  Q. How about Chris Turner, is that also the safething transport of the condition of the profile of a year, and I received a merit increase while I was there. When I left my rate was \$340,000 a year.  Q. Do you know of any Adelphia personnel that were paid higher than you?  A. I don't know what any of the Rigases  Year,  Q. Do you know what any of the Rigases  Year,  Q. Do you know what any of the Rigases?  A. No. I never asked them what their motivated them to engage in conduct which got them into the situation that their was placed in conduct which got them into the situation that their was placed in conduct which got them into the situation that their was placed in conduct which got them into the situation that their and the profile in conduct which got them into the situation that their and the profile in conduct which got them into the situation that their and the profile in conduct which got them into the situation that their and the profile in conduct which got them into the situation that they had to testify about in the criminal trial?  A. No. I never asked them what their and to testify about in the criminal trial Rate throrshink			10	Volumentioned a couple of popula with whom
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